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ATTORNEYS FOR PLAINTIFF AND THE PROPOSED CLASS

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Maggie Thomson, as representative of a class
of similarly situated persons, and on behalf of
the Caesars Entertainment Corporation Savings
& Retirement Plan,

Plaintiff,

v.

Caesars Holdings Inc. and Russell
Investment Management LLC,

Defendants.

Case No. 2:21-cv-00961-GMN-BNW

**STIPULATION REGARDING
AMENDED COMPLAINT AND
DEADLINE TO ANSWER OR
OTHERWISE RESPOND**

Plaintiff Maggie Thomson, as representative of a class of similarly situated persons, and on behalf of the Caesars Entertainment Corporation Savings & Retirement Plan, and Defendants Russell Investment Management LLC (“RIM”) and Caesars Holdings, Inc. (collectively, the “Parties”), by and through their undersigned counsel, hereby stipulate and agree that Plaintiff Maggie Thomson, pursuant to Fed. R. Civ. P. 15(a), will file an amended complaint on or before July 30, 2021, that an answer or response to the original complaint is not required, and that the deadline for Defendants to answer or otherwise respond to the amended complaint shall be August 30, 2021. Plaintiff avers that there is good cause to enter into this stipulation to ensure that the proper parties are before the Court.¹ Further, this stipulation is not made for purposes of delay, but rather to ensure that the contemplated amendments are made before Defendants respond to the existing Complaint.

Accordingly, the Parties request that the Court approve this stipulation and grant Defendants until August 30, 2021 to answer or otherwise respond to Plaintiff’s amended complaint, which she will file on or before July 30, 2021. Defendants do not waive any defenses by entering into this stipulation nor are they agreeing that any newly-named defendant is a proper party or otherwise engaged in any wrongdoing.

Dated: July 27, 2021

NICHOLS KASTER, PLLP

/s/ Benjamin J. Bauer

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Dated: July 27, 2021

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¹ After meeting and conferring with Defendants, Plaintiff intends to file an amended complaint to remove RIM as a defendant, add Russell Investments Trust Company (“RITC”) as a defendant, and add the Investment Committee of the Caesars Entertainment Corporation Savings & Retirement Plan as a defendant.

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17 **Order**

18 **IT IS SO ORDERED**

19 **DATED:** 6:25 pm, July 29, 2021

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21 **BRENDA WEKSLER**
22 **UNITED STATES MAGISTRATE JUDGE**
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